## OR CZARA Issue List (Draft, 7/29/14)

- 1. Whether new management measures can (attorneys say yes) or should be added for agriculture (Lead: Alan).
- 2. Whether agriculture MMs continues to meet threshold for approvability now that we have better knowledge of the AWQMA Program and it is clear the plans are voluntary. Would OR need to meet the "3-prong" test for voluntary programs even though we didn't condition OR's program as such back in 1998? (Lead: Alan)
- 3. Penalty amount calculations (Lead: Jayne/Don)
- 4. Whether EPA/NOAA would approve additional forestry MMs/riparian if riparian rule includes management measures that adequately protect riparian areas of medium and small fish bearing streams but fails to address non-fish bearing streams (Lead: Alan).
- 5. Threshold for back-up enforcement authority for OSDS (Lead: Don).
- How to address concerns raised during the public comment period about Oregon's monitoring program and other MMS on which NOAA and EPA did not request public comment (Lead: Allison).
- 7. Whether EPA/NOAA can approve additional MMs for Forestry for roads, given the lack of a sufficient description of voluntary program focused on preventing water quality impacts from legacy roads. (Lead: Chris)
- 8. Whether EPA/NOAA can approve additional MMs for Forestry for landslide prone areas, given Oregon provided an inadequate approach on addressing high-risk landslide prone areas with the potential to impact water quality and designated uses (Lead: Chris).

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